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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NICHOLLE VANNUCCI, ELLEN BROWN,
and SHANNON HALL, individuals; and
HOMELESS ACTION!, an unincorporated
association,

Plaintiffs,

vs.

COUNTY OF SONOMA, SONOMA
COUNTY COMMUNITY DEVELOPMENT
COMMISSION, CITY OF SANTA ROSA,
Does 1 to 10, et al.,

Defendants.

Case No. 18-CV-01955-VC

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND FACT DISCOVERY AND
EXPERT DISCOVERY DEADLINES**

Judge: Hon. Vince Chhabria

Trial Date: March 9, 2020

Plaintiffs NICHOLLE VANNUCCI, ELLEN BROWN, and SHANNON HALL, as individuals, and HOMELESS ACTION!, an unincorporated association (collectively “Plaintiffs”) and Defendants COUNTY OF SONOMA, SONOMA COUNTY COMMUNITY DEVELOPMENT COMMISSION, and CITY OF SANTA ROSA (collectively “Defendants”), by and through their undersigned counsel in the above-captioned matter, stipulate as follows:

This action was initiated on March 30, 2018, when Plaintiffs filed their Complaint (ECF No. 1);

The Court held an initial Case Management Conference on July 3, 2018, at which time an initial trial date and pretrial deadlines were established;

Plaintiffs filed their operative Supplemental Complaint on July 17, 2018 (ECF No. 68);

The parties participated in settlement conferences with the Court on November 28, 2018, December 12, 2018, December 19, 2018, January 7, 2019, and January 22, 2019.

The Court directed the parties in a further Case Management Conference on January 30, 2019 to submit a stipulation with a revised scheduling order further continuing the trial date and all pretrial deadlines by approximately two months;

The Court further extended the trial date and all associated pretrial deadlines on February 20, 2019 pursuant to the parties’ stipulation (ECF Nos. 99 and 100);

The parties attended a further Case Management Conference with the Court on May 14, 2019 when the Court granted plaintiffs’ request to extend the Fact Discovery Cut-off date to July 19, 2019, and scheduled another settlement conference for June 10, 2019;

Matthew Lilligren substituted into this case on June 5, 2019 as one of the lead attorneys for Defendants County of Sonoma and Sonoma County Community Development Commission, following the departure of Christopher Magaña from the Sonoma County Counsel’s office in the beginning of June, and has requested that the parties accommodate his late entry into the case with a short extension of the current Fact and Expert Discovery Deadlines;

The Court held telephonic settlement conferences with defendants and plaintiffs on June 10, 2019, extended the deadline for disclosure of expert reports to July 19, 2019, and ordered

defendants to circulate a draft settlement proposal for further consideration by plaintiffs; at the Court's direction, the time to do so has been extended;

The Parties, in anticipation of working on a draft settlement proposal with the Court, therefore respectfully request a short extension of the approaching Fact and Expert Discovery Deadlines to accommodate the request made by the County and CDC's new counsel and the ongoing settlement discussions.

Further extension of the fact and expert discovery deadlines will not alter the previously established trial date or pretrial motion deadlines.

IT IS THEREFORE STIPULATED as follows:

1. Fact Discovery Cut-off is continued from July 19, 2019 to August 16, 2019;
2. The Deadline for Disclosure of Opening Expert Reports is continued from July 19, 2019 to August 23, 2019;
3. The Deadline for Disclosure of Rebuttal Expert Reports is continued from July 26, 2019 to September 13, 2019;
4. Expert Discovery Cut-off is continued from September 27, 2019 to October 18, 2019; and
5. The Trial Date and all remaining Pretrial Deadlines remain as previously set by the Court.

///

Date: June 20, 2019

BRUCE D. GOLDSTEIN, County Counsel

By: _____/s/_____

MATTHEW R. LILLIGREN
Attorneys for Defendants
County of Sonoma; Sonoma County
Community Development Commission

Date: June 20, 2019

SUE A. GALLAGHER, City Attorney

By: _____/s/_____

ROBERT L. JACKSON
Attorneys for City of Santa Rosa

Date: June 20, 2019

CALIFORNIA RURAL LEGAL
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By: _____/s/_____

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ECF ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I, Matthew R. Lilligren, attest that I have obtained concurrence in the filing of this document from the other signatories to this document.

[PROPOSED] ORDER

The Court having considered the Stipulation and [Proposed] Order to Extend Fact Discovery Cut-Off and Expert Discovery Deadlines, ORDERS as follows:

1. Fact Discovery Cut-off is continued to August 16, 2019;
2. The Deadline for Disclosure of Opening Expert Reports is continued to August 23, 2019;
3. The Deadline for Disclosure of Rebuttal Expert Reports is continued to September 13, 2019;
4. Expert Discovery Cut-off is continued to October 18, 2019; and
5. The Trial Date and all remaining Pretrial Deadlines remain as previously set by the Court:

Last Day for Hearing on Dispositive Motions	December 19, 2019
Final Pretrial Conference	February 19, 2020
Trial Begins	March 9, 2020

The Court previously ordered, the following extensions of time:

1. Extension of time for Defendants to answer or otherwise respond to Plaintiffs' complaint (ECF No. 43).
2. Extension of time for Plaintiffs to amend their Complaint, and for Defendants to respond (ECF No. 45).
3. Extension of time for Defendants to answer or otherwise respond to Plaintiffs' First Amended Complaint (ECF No. 62).
4. Extension of time for Defendant City of Santa Rosa to answer the Supplemental Complaint. (ECF No. 85).
5. Extension of all litigation deadlines (ECF No. 100).

6. Extension of close of fact discovery (ECF No. 103).
7. Extension of deadline for initial expert reports (ECF No. 105).

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: _____

Hon. Vince Chhabria
United States District Court Judge